stated that Applicant's arguments with respect to a prevention of the interception of incoming data that the Examiner considers insertion of data into the actual data is the act of prevention. Applicant respectfully requests reconsideration as it appears that the claim language may not be fully appreciated nor the teachings of Fadem. As Applicant notes, the link flow control bits in the Fadem reference are actual data and not insertion data as actual data is data that is used by the system. As set forth in the cited portion of Fadem, namely column 12, the link flow control characters are used by the system and stored in the received FIFO. Applicant's claim language must also be taken into account. In claim 1 for example, the insertion data prevents interception of incoming data as claimed. The LFC described in Fadem in no way prevents any interception of incoming data. If the rejection is maintained, Applicant respectfully requests a showing as to where Fadem states that the LFC prevents interception of incoming data. The LFC cannot be insertion data that prevents interception of incoming data as no incoming data is being prevented from being intercepted in the Fadem reference. The LFC data is in fact protocol information which consists of expected values and would appear at consistent fixed locations that do not vary over time. This information can be removed by anyone who has knowledge of the protocol and this information does not prevent interception of any incoming data.

In contrast, Applicant claims insertion data to prevent interception of the incoming data. As such, the inserted data may be, but is not limited to, random noise, or data that appears seemingly random within a data stream or any other suitable data that prevents interception of incoming data. The insertion data does not convey any information unlike the LFC data. See for example, column 12, lines 7-21, column 12, lines 31-52 indicating that the LFC data is defined and required protocol information. As also noted in the claim, the received incoming data which contains actual data and the insertion data wherein the insertion data prevents interception of incoming data, is filtered as claimed. The Fadem

2

reference does not contemplate the insertion of any data that prevents interception of actual data. As such, the claims are allowable for this reason alone.
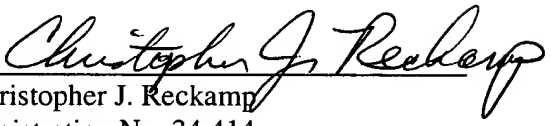
Applicant also respectfully reasserts the relevant remarks made in the previous response with respect to the Young reference and as such, the claims are also allowable for these reasons as well.

The dependent claims add additional novel and non-obvious subject matter.

Accordingly, Applicant respectfully requests that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

Date: <u>March 23, 2005</u>   By:_____

Christopher J. Reckamp
Registration No. 34,414

Vedder, Price, Kaufman & Kammholz, P.C.
222 N. LaSalle Street
Chicago, Illinois 60601
PHONE: (312) 609-7599
FAX: (312) 609-5005

3